

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

**L. M.**, a minor by and through his father  
and stepmother, Christopher and Susan  
Morrison,

*Plaintiff,*

Case No.: 23-cv-11111

v.

**TOWN OF MIDDLEBOROUGH;  
MIDDLEBOROUGH SCHOOL  
COMMITTEE; CAROLYN J. LYONS,**  
Superintendent of the Middleborough  
Public Schools, in her official capacity;  
and **HEATHER TUCKER**, acting  
Principal of Nichols Middle School, in  
her official capacity,

*Defendants.*

**MOTION FOR ADMISSION *PRO*  
*HAC VICE* OF TYSON C.  
LANGHOFER**

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**MOTION FOR ADMISSION *PRO HAC VICE* OF TYSON C. LANGHOFER  
(WITH DECLARATION OF TYSON C. LANGHOFER)**

Pursuant to Local Rule 83.5.3, the undersigned moves this Court for an order permitting Tyson C. Langhofer to appear and participate *pro hac vice* in this action on behalf of Plaintiff L.M. Tyson C. Langhofer is an attorney with Alliance Defending Freedom, 44180 Riverside Pkwy, Lansdowne, Virginia 20176, telephone (571) 707-4655, email tlanghofer@ADFlegal.org. Tyson C. Langhofer specializes in First Amendment litigation.

Tyson C. Langhofer is a member in good standing of the Bar of the State of Virginia (Bar Registration Number 95204) and every other state in which he has been admitted to practice. Furthermore, he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Tyson C. Langhofer does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. Neither is he the subject of any pending disciplinary proceedings nor has he ever been disciplined by any state bar or disciplinary committee.

Accordingly, it is respectfully requested that Tyson C. Langhofer be admitted *pro hac vice* to appear as counsel on behalf of Plaintiff L.M. in this matter.

Respectfully submitted this 19<sup>th</sup> day of May, 2023.

*s/ Andrew Beckwith*

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Andrew Beckwith  
MA Bar No. 657747  
MASSACHUSETTS FAMILY INSTITUTE  
401 Edgewater Place, Suite 580  
Wakefield, MA 01880  
Telephone: (781) 569-0400  
andrew@mafamilly.org

*Attorney for Plaintiff*

**DECLARATION OF TYSON C. LANGHOFER  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, I, Tyson C. Langhofer, declare that

1. My name, office address, and telephone number are as follows:  
  
Tyson C. Langhofer  
Alliance Defending Freedom  
44180 Riverside Parkway  
Lansdowne, Virginia 20176  
Telephone: (571) 707-4655
2. I have been admitted to the Virginia State Bar.
3. I am a member of the bar in good standing in every jurisdiction in which I am admitted to practice.
4. I certify that I am not the subject of disciplinary proceedings pending in any jurisdiction in which I am a member of the bar.
5. I certify that I have not previously had a *pro hac vice* admission to this court revoked for misconduct.
6. I have read and agree to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.
7. I certify my understanding of Federal Rule of Civil Procedure 5.2(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of May, 2023.

s/ Tyson C. Langhofer  
Tyson C. Langhofer

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2023, I electronically filed the foregoing using the CM/ECF system, and will serve the same via email with Plaintiff's Verified Complaint on Counsel for the following parties:

Gregg Corbo  
KP Law  
101 Arch St,  
Boston, MA 02110  
gcorbo@k-plaw.com

*Counsel for*  
**Town Of Middleborough**

Kay H. Hodge, Esquire  
Stoneman, Chandler & Miller LLP  
99 High Street  
Boston, MA 02110  
(617) 542-6789 (work)  
(617) 686-8858 (cell)  
(617) 340-8587 (fax)  
khodge@scmllp.com

*Counsel for*  
**Middleborough School Committee**  
**Carolyn J. Lyons**  
**Heather Tucker**

Dated: May 19, 2023

*s/Andrew Beckwith*

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Andrew Beckwith

*Attorney for Plaintiff*